# Exhibit A

United States of America ex rel. Ven-a-Care of the Florida Keys, Inc. v. Boehringer Ingelheim Corp. et al.

Civil Action No. 07-10248-PBS

Exhibit to United States' Opposition To Roxane's Motion For Leave To Depose Carolyn Helton and Robin Kreush Stone

# Case 1:01-cv-12257-PBS Document 6355-2 Filed 08/06/09 Page 2 of 5



#### **U.S. Department of Justice**

Civil Division, Fraud Section

601 D Street, NW Washington, D.C. 20004 Telephone: (202) 305-9300 Telecopier: (202) 616-3085

<u>Via Electronic Transmission</u> (Enclosures by Over-night Delivery) January 31, 2008

Eric Gortner Kirkland & Ellis 200 East Randolph Drive Chicago, Illinois 60601-6636

Re: Average Wholesale Price Multi-District Litigation

MDL No. 1456/C.A. No. 01-12257-PBS (D. Mass.)

#### Dear Counsel:

Enclosed please find two production discs. Disc bearing bates prefix "AWQ138" contains material pertaining to the President's budgets for the years 1990 through 2001; disc "AWQ020" contains material originating from Medicare Part B carrier Cigna Government Services.

Thank you for your attention.

Very Truly Yours,

/s/ Laurie Oberembt Senior Trial Counsel Commercial Litigation Branch

Enclosures cc: James Breen George B. Henderson Richard Goldstein

#### Case 1:01-cv-12257-PBS Document 6355-2 Filed 08/06/09 Page 3 of 5



## U.S. Department of Justice

Civil Division, Fraud Section

601 D Street, NW Washington, D.C. 20004 Telephone: (202) 305-9300 Telecopier: (202) 616-3085

Via Electronic Transmission

January 31, 2008

(Enclosures by Over-night Delivery)

David Torborg Jones Day 51 Louisiana Ave., N.W. Washington, DC 20001-2113 Martin F. Murphy Foley Hoag LLP 155 Seaport Blvd Boston, MA 02210-2600

Neil Merkl William A. Escobar Kelley Drye & Warren, LLP 101 Park Avenue New York, NY 10178 Eric Gortner Kirkland & Ellis 200 East Randolph Drive Chicago, Illinois 60601-6636

Re: Average Wholesale Price Multi-District Litigation MDL No. 1456/C.A. No. 01-12257-PBS (D. Mass.)

#### Dear Counsel:

Enclosed please find eight compact discs containing material from two Medicare Part B Carriers. Containers bearing bates prefixes AWQ031 through AWQ036, and container AWQ038, include material originating from carrier Wisconsin Physician Services; container AWQ037 includes material originating from carrier Palmetto GBA.

Please note that container AWQ038 will be provided to counsel for Roxane tomorrow, February 1, 2008. Thank you for your attention.

Very Truly Yours,

/s/ Laurie Oberembt Senior Trial Counsel Commercial Litigation Branch

Enclosures cc: James Breen Richard Goldstein George B. Henderson



# U.S. Department of Justice

# United States Attorney District of Massachusetts

John Joseph Moakley U.S. Courthouse, Suite 9200

Writer's Direct Dial Number:
(617) 748-3272 1 Courthouse Way

Telecopier: (617) 748-3971 Boston, Massachusetts 02210

<u>Via Electronic Transmission</u> (Enclosures by Over-night Delivery) March 3, 2008

David Torborg Neil Merkl

Jones Day William A. Escobar

51 Louisiana Ave., N.W. Kelley Drye & Warren, LLP

Washington, DC 20001-2113 101 Park Avenue

New York, NY 10178

Eric Gortner Martin F. Murphy Kirland & Ellis Foley Hoag LLP 200 East Randolph Drive 155 Seaport Blvd

Chicago, Illinois 60601-6636 Boston, MA 02210-2600

Re: Average Wholesale Price Multi-District Litigation

MDL No. 1456/C.A. No. 01-12257-PBS (D. Mass.)

### Dear Counsel:

Enclosed please find compact disc AWQ039 containing material originating from Medicare Part B carrier Cigna Government Services.

Sincerely,

/s/

George B. Henderson, II Assistant U.S. Attorney

March 3, 2008 Page 2

Enclosures cc: James Breen Richard Goldstein George B. Henderson